

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION

UNITED STATES OF AMERICA	)	DOCKET NO. <b>1:25-CR-11-MR-WCM</b>
	)	
VS.	)	<b>FACTUAL BASIS</b>
	)	
JONATHAN PEREZ	)	
_____	)	

NOW COMES the United States of America, by and through Lawrence J. Cameron, Acting United States Attorney for the Western District of North Carolina, and hereby files this Factual Basis in support of the plea agreement filed simultaneously in this matter.

This Factual Basis is filed pursuant to Local Criminal Rule 11.2 and does not attempt to set forth all of the facts known to the United States at this time. By their signatures below, the parties expressly agree that there is a factual basis for the guilty plea(s) that the defendant will tender pursuant to the plea agreement, and that the facts set forth in this Factual Basis are sufficient to establish all of the elements of the crime(s). The parties agree not to object to or otherwise contradict the facts set forth in this Factual Basis.

Upon acceptance of the plea, the United States will submit to the Probation Office a "Statement of Relevant Conduct" pursuant to Local Criminal Rule 32.4. The defendant may submit (but is not required to submit) a response to the Government's "Statement of Relevant Conduct" within seven days of its submission. The parties understand and agree that this Factual Basis does not necessarily represent all conduct relevant to sentencing. The parties agree that they have the right to object to facts set forth in the presentence report that are not contained in this Factual Basis. Either party may present to the Court additional relevant facts that do not contradict facts set forth in this Factual Basis.

1. On or about July 1, 2019, in Swain County, within the Western District of North Carolina, and elsewhere, Jonathan PEREZ, did knowingly and intentionally possess with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. More specifically, on July 1, 2019, at approximately 10:49 p.m., a deputy with the Swain County Sheriff's Office ("SCSO") stopped a 2010 Chevrolet Camaro Coupe 2SS for speeding. As the deputy approached the Camaro, he observed three male occupants and detected the strong odor of alcohol and marijuana emanating from the vehicle. PEREZ was the rear passenger, V.P. was front passenger, and A.P. was the driver. The Camaro was registered to PEREZ. Other deputies of the SCSO arrived and assisted with the traffic stop.

3. Deputies then removed the occupants and searched the Camaro. Deputies found a white sweatshirt that was rolled up with the arms tied together on the floorboard where PEREZ had been

sitting. The sweatshirt bundle contained two large bags of methamphetamine ("meth"). The DEA Mid-Atlantic Laboratory analyzed the seizure and found the substance contained meth, the net weight was 1,853.3 grams, was 98% pure, and contained 1,798.5 actual grams of meth.

4. V.P. and A.P. were interviewed and denied knowledge of the methamphetamine. They also consented to searches of their phones, and officers found no evidence of drug trafficking activity on either phone.

5. PEREZ possessed the meth seized on July 1, 2019, with the intent to distribute to others.

LAWRENCE J. CAMERON  
ACTING UNITED STATES ATTORNEY



CHRISTOPHER S. HESS  
ASSISTANT UNITED STATES ATTORNEY

Defendant's Counsel's Signature and Acknowledgment

I have read this Factual Basis, the Bill of Information, and the plea agreement in this case, and have discussed them with the defendant. Based on those discussions, I am satisfied that the defendant understands the Factual Basis, the Bill of Information, and the plea agreement. I hereby certify that the defendant does not dispute this Factual Basis.



Emily M. Jones, Attorney for Defendant

DATED: 2/27/25